



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

September 23, 2010

IN REPLY PLEASE

REFER TO FILE: WM-6

Ms. Lynda Deschambault
Remedial Project Manager
U.S. Environmental Protection
Agency – Region 9
75 Hawthorne Street (SFD -7-1)
San Francisco, CA 94105

Dear Ms. Deschambault:

OMEGA CHEMICAL CORPORATION SUPERFUND SITE - OPERABLE UNIT NO. 2 PROPOSED PLAN FOR ADDRESSING GROUNDWATER CONTAMINATION

We appreciate the opportunity to review the proposed plan for alternative remedial actions to address groundwater contamination at the Omega Chemical Corporation Superfund Site in the City of Whittier known as Operable Unit No. 2 (OU2). Although the preferred alternative noted in the plan recommends using the treated groundwater to supplement local drinking water supplies, we offer the following comments on Alternative No. 5, which proposes to discharge treated groundwater into the San Gabriel River with subsequent infiltration in the spreading grounds:

The proposed discharge of treated groundwater into the Los Angeles County Flood Control District (LACFCD) system will require a Flood Permit and verification of coverage and/or exemption under an applicable National Pollutant Discharge Elimination System Permit issued by the Regional Water Quality Control Board. The quality of the proposed discharge would need to meet surface water-quality standards before being discharged to the LACFCD system including the spreading grounds.

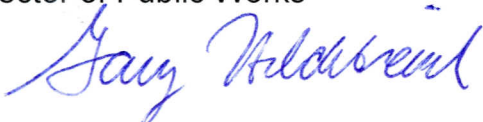
If Alternative No. 5 is selected, a spreading agreement would need to be developed. This would include discussions on availability of the grounds for recharge including priority of stormwater, imported water, and reclaimed water purchased by others being spread before the OU2 effluent discharges. The agreement would include clauses for indemnity against lawsuits related to the OU2 discharges and may include a requirement for payment of a proportionate share of the maintenance costs for the LACFCD spreading grounds used.

Ms. Lynda Deschambault
September 23, 2010
Page 2

If you have any questions or concerns about these comments, please contact me at (626) 458-4300 or ghildeb@dpw.lacounty.gov or your staff may contact Ms. Terri Grant at (626) 458-4309 or tgrant@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



GARY HILDEBRAND
Assistant Deputy Director
Watershed Management

LA:cp

P:\wmpub\Secretarial\2010 Documents\Letters\Comment Letter to EPA.docx\10366

cc: County Counsel (Judith Fries)